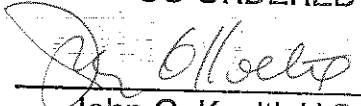


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1271 Avenue of the Americas | New York, NY 10020  
blankrome.com

Phone: (212) 885-5148  
Fax: (917) 591-7897  
Email: [deborah.skakel@blankrome.com](mailto:deborah.skakel@blankrome.com)

APPLICATION GRANTED  
SO ORDERED

  
John G. Koeltl, U.S.D.J.

8/5/22  
August 5, 2022

## VIA ECF

The Honorable John G. Koeltl  
United States District Judge  
United States District Court – S.D.N.Y.  
500 Pearl Street, Room 14A  
New York, New York 10007

**Re: City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.,  
No. 1:15-cv-05345 (JGK) (KHP)**

Dear Judge Koeltl:

We represent Triadou SPV S.A. (“Triadou”) in the above-referenced case and write to respectfully request that, consistent with the Court’s July 6, 2022 Order, (ECF 1509), as modified by the Court’s July 29, 2022 Order, (ECF 1565), the Court permit Triadou to file under seal certain pretrial submissions that contain information designated confidential by third parties pursuant to the protective order in this matter. As required by Rule VI.A.2 of the Court’s Individual Practices, Triadou will publicly file redacted or slip-sheeted versions of its under-seal filings, and file under seal copies of the unredacted versions of those documents with any proposed redactions highlighted.

Through this letter-motion, Triadou seeks leave to file under seal its (i) responses to Plaintiff BTA Bank’s (“BTA”) proposed findings of fact and conclusions of law; (ii) memorandum of law in opposition to BTA’s motion in limine #2; (iii) memorandum of law in opposition to BTA’s motion in limine #3; (iv) memorandum of law in opposition to BTA’s motion in limine #5; (v) the declaration of Deborah A. Skakel in support thereof (the “Skakel Declaration”); (vi) certain exhibits to the Skakel Declaration; and (vii) Triadou’s chart of deposition designations with objections and responses (filed as an attachment to the parties’ joint letter).

With respect to Triadou’s memorandum of law in opposition to BTA’s motion in limine #3, Triadou intends to file that document and all accompanying exhibits entirely under seal, with only a cover sheet and placeholder as the publicly-filed version. Those materials solely address testimony a third party has designated as confidential and filing any portion of the memorandum of law or the accompanying exhibits would reveal the information designated for protection.

Pursuant to the Court’s July 6 Order, as amended by the Court’s July 29, 2022 Order, by August 10, 2022, Triadou will notify third parties of any documents or testimony temporarily filed under seal in connection with today’s submissions (and the materials Triadou submitted on July 8, 2022). Triadou will also provide a copy of the Court’s July 6 and July 29, 2022 Orders and advise any third party who intends to seek sealing of the implicated information that they must submit a letter-motion identifying the basis for sealing by August 17, 2022.

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The Honorable John G. Koeltl

August 5, 2022

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Thank you for your consideration of this request.

Respectfully submitted,

/s/ Deborah A. Skakel  
Deborah A. Skakel